Cyfoeth Naturiol Cymru
Natural Resources Wales

Natural Resources Wales permitting decisions

Llanshay Farm Limited (Llanshay Farm) Decision Document

Contents

Substantial Variation

The variation number is: EPR/AB3593ZL/V002

The operator is: Llanshay Farm Limited

The Installation is located at: Llanshay Farm, Llanshay Lane, Knighton, Powys, LD7 1LW

We have decided to issue the variation for Llanshay Farm operated by Llanshay Farm Limited.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise, we have accepted the applicant's proposals.

1. Receipt of application

The application was received on 27/06/2022. In order for us to consider the application duly made we needed further information. We requested, via email on 31/10/2022, a revised site installation site plan and ammonia modelling. The applicant provided justification for not providing a ammonia modelling with this application which we accepted for the purpose of duly making. Upon receipt of this justification and a revised site plan, we accepted the application as duly made on 31/10/2022**.** This means we considered it was in the correct form and contained sufficient information for us to begin our determination, but not that it necessarily contained all the information we would need to complete that determination.

1.1 Confidential information

No claim for commercial or industrial confidentiality has been made.

2. Outline of the application

The existing permit allows for the rearing of up to 110,000 broilers birds in 2 poultry sheds. This substantial variation is to vary the permit to increase the number of broiler birds permitted to 200,000. To accommodate this increase, 2 new poultry sheds are proposed. Air scrubbing units are proposed to be installed on the new sheds and the existing sheds to reduce ammonia emissions, odour emissions and other pollutants. The applicant has predicted the variation would result in 82% reduction in ammonia emissions compared to the existing permitting scenario whereby the existing sheds are not permitted to have air scrubbing units installed.

3. Consultation

3.1 Consultation on the application

The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.

A copy of the application and all other documents relevant to our determination (see below) are available for the public to view. Anyone wishing to see these documents could arrange for copies to be made.

We sent copies of the Application to the following bodies, which includes those with whom we have "Working Together Agreements":

- Health & Safety Executive
- Public Health Wales
- Powys County Council – planning department
- Powys County Council – environmental health department

These are bodies whose expertise, democratic accountability and/or local knowledge make it appropriate for us to seek their views directly.

The consultation started on 08/02/2023 and ended on 08/03/2023. An advert was also placed on our website for the purpose of consulting with the public.

Further details along with a summary of consultation comments and our response to the representations we received can be found in Annex 1. We have taken all relevant representations into consideration in reaching our determination.

3.2. Draft Permit Consultation

Our public participation statement[1] gives more information on what can, and cannot, be taken into account when making our permitting decision.

We are now carrying out a consultation on our draft decision. This consultation will begin on **10/07/2025** and end on **14/08/2025.**

4. Requests for further information

Further information was requested during determination by way of Schedule 5 Notices.

[1] Natural Resources Wales / Public participation: how you can take part in our permit and licence consultations

The first Schedule 5 Notice requiring the applicant to provide further information relating to ammonia emissions, was sent on 24/11/2022 with a response date of 07/12/2022, which was extended at the request of the applicant, until 17/12/2022. A response to the Schedule 5 Notice was provided on 14/12/2022.

The second Schedule 5 Notice information request was sent on 16/05/2023 with a response date of 13/06/2023, which was extended at the request of the applicant, until 13/07/2023. A response to the Schedule 5 Notice was provided on 14/06/2023.

These information requests and the applicant responses will be discussed in detail in section 10.1 of this document.

5. The Facility

The regulated facility is an installation which comprises the following activity listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations (EPR):

- Section 6.9 A(1)(a)(i) - Rearing of poultry or pigs intensively in an installation with more than 40,000 places for poultry.

The limit of this activity will be changed on the permit as a result of this variation whereby the maximum number of broilers permitted will be increased from 110,000 to 200,000. As the increase in the number of broilers was above 40,000 the variation was deemed a substantial variation in accordance with the Regulatory Guidance Note 8[2].

An installation may also comprise “directly associated activities”, which at the existing facility included:

- Dirty water tanks

As part of this variation, the following directly associated activities will also be added:

- Air scrubbers
- Generator
- Fuel oil tank

[2] Substantial changes in operation at installations, mining waste facilities and other facilities involving solvent and combustion (naturalresources.wales)

- Chemical store
- Liquid Petroleum Gas (LPG) tanks

Together, these listed and directly associated activities comprise the Installation.

6. Operation of the Installation - Management

The applicant has stated in the application that following the variation they will have in place an Environmental Management System (EMS) that will meet the requirements for an EMS in our guidance. The applicant submitted a summary of the EMS with their application which we consider satisfactory.

7. Legislation

The variation will be issued under Regulation 20 of the Environmental Permitting Regulations 2016 (EPR). The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an installation as described by the Industrial Emission Directive 2010 (IED);
- subject to aspects of the Well-Being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 which also have to be addressed.

We address the legal requirements directly where relevant in the body of this document. NRW is satisfied that this decision is consistent with its general purpose of pursuing the sustainable management of natural resources (SMNR) in relation to Wales, and applying the principles of SMNR. In particular, NRW acknowledges that it is a principle of sustainable management to take action to prevent significant damage to ecosystems. We consider that, in issuing the permit a high level of protection will be delivered for the environment and human health through the operation of the Installation in accordance with the permit conditions.

All applicable European directives have been considered in the determination of the application.

7.1 Other Legal Matters relevant to the Facility

Our decision on whether to issue or refuse an EPR permit is defined by legal requirements. In our decision-making, we must ensure that our determination considers all relevant statutory requirements and provides the required level of protection to the environment. This involves assessment of impacts to air, water, land and any ecological receptors from the proposed activities.

NRW's function as the environmental permitting authority under EPR, only extends to the control of sources of pollution within the boundary of the regulated facility, which are capable of being controlled under the environmental permit. In addition and so as to comply with its general public law duty, NRW's decisions must be reasonable, proportionate and procedurally correct.

The potential for pollution through the land use of a proposal is assessed through the planning application. The LPA is responsible for considering whether the location of the development is appropriate. NRW is an advisor to the Local Planning Authority (LPA).

8. The site

The existing site is located to the southeast of Knighton, Powys. The predominant land use surrounding the site is grassland and grazing.

The operator has applied to extend the site boundary as part of this variation and has provided an updated plan which we consider is satisfactory, showing the new extent of the facility. The updated plan shows the existing and new air emission points, location of discharges of uncontaminated water to land from the new sheds and the locations of the dirty water tanks which will be used to store contaminated washdown water.

This plan will be included in the permit and the operator is required to carry on the permitted activities within the site boundary.

8.1 Site condition report

The applicant has provided description of the condition of the additional land being added to the site.

We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports – guidance and templates (H5)[3].

9. Impact on National Site Network, SSSIs, non-statutory conservation sites

The applicant has used a screening distance of 5 km to identify relevant ecological receptors in line with Natural Resources Wales / Ammonia assessments: initial screening and evidence gathering (GN 020).

Relevant National Network Sites[4], Sites of Special Scientific Interest (SSSI) and non-statutory conservation sites will be discussed separately below.

9.1 The National Site Network

Our Habitats Risk Assessment (HRA) approach for an intensive poultry farm EPR permit application is limited to the assessment of any potential impact on the integrity of a European Site (i.e. SAC, SPA, Ramsar) from the proposed regulated activities carried out within the installation boundary.

As an advisor to the LPA, the land use planning process is an opportunity for NRW to raise any concerns in respect of manure management that may adversely impact on the quality of local water courses in line with our duties under the Water Framework Directive. However, once manure leaves the installation boundary, it is more appropriately assessed for HRA purposes by the LPA because there is no legal vires for this to be conditioned or regulated by the EPR permit for the installation. On this basis, our habitats regulations assessment for this application is necessarily limited to potential likely significant effects / adverse effects associated with regulatory activities carried out within the installation boundary and we defer any decision on off-site storage, disposal and application of chicken manure to the LPA.

[3] Environmental Permitting Regulations , Guidance for applicants H5, Site Condition Report, Guidance and Template (naturalresources.wales)
[4] Previously referred to a Natura 2000/RAMSAR sites

In this case, no National Site Network sites have been identified within 5 km of the installation.

9.2. SSSI Assessment

River Teme, Gwernaffel Dingle and Brampton Bryan Park SSSI are within 5 km of the installation.

An Appendix 4 form was completed to assess the potential of the proposed variation to affect this site. The assessment concluded the proposed variation is not likely to damage the SSSI. Please refer to the Appendix 4 form (saved to the public register, dated 14/08/2023) and section 10.1 of this report for more information.

9.3 Non statutory site assessment

Several sensitive Ancient Woodland sites have been identified within 5 km of the installation. The Applicant provided ammonia modelling which predicted emissions of ammonia at these sites. The modelling results indicated impacts as a result of the variation would be insignificant. As a result, there are no anticipated adverse impacts to non-statutory sites as a result of this variation. See section 10.1 for more information.

10. Environmental Risk Assessment

10.1 Air

Modelling and assessment approach

The principal pollutant emitted to air from Intensive Farming installations is ammonia.

The application submitted did not initially include any ammonia modelling due to the addition of certified air scrubbers to the site (one to each poultry house, including the two existing houses) predicted to result in a significant reduction in ammonia emissions, despite nearly doubling the broiler population. This was demonstrated with calculations based on the standard emission factors for broilers with a 90% abatement factor applied based on the certified performance of the air scrubbing unit proposed. To verify the betterment, a Schedule 5 Notice was sent to request information related to the design and sizing of the scrubbers. The applicant provided details of how the

scrubbers ventilation capacity had been calculated which was in line with NRW guidance[5].

Responses to the initial consultation on the application (see Annex 1) highlighted that the planning permission granted for the 110,000 broilers in 2 sheds (19/0743/FUL) has conditions requiring scrubbers to be installed[6], despite this not being a stipulation of the existing environmental permit. An informal information request was sent to the applicant, asking for clarification on if the 2 sheds already permitted had been built and if these have had scrubbers installed as per the planning condition requirements. The applicant confirmed that the existing permitted sheds had not yet been constructed.

We therefore determined that the claim that the proposed extension will result in a reduction of ammonia emissions, is therefore not a result of a comparison against the true existing scenario. We were unable to determine if the impact on sensitive sites is acceptable or not based on the information submitted. Ammonia modelling to assess the impact of the entire proposed site (200,000 birds) was therefore requested by way of Schedule 5 Notice (see section 4).

The scope of assessment for impacts from ammonia emissions from intensive farming installations is usually restricted to sensitive habitat sites and detailed assessment of impact to human health is not required. We consider this appropriate as it has been established that it is unlikely that ammonia emissions from a well-run and regulated farm will be sufficient to cause ill health. Not assessing impact to human health is also in line with the Health Protection Agency on Intensive Farming permit applications (dated 2006).

Ammonia critical levels (Cle) are used as a standard to ensure sensitive habitat sites are protected and sustainable development is enabled. Depending on the habitats and species that may be adversely affected from ammonia emissions, a critical level of either 1 µg/m^3 or 3 µg/m^3 is to be used.

[5] Natural Resources Wales / Ammonia scrubber design and use
[6] 19_0743_FUL-FULL_APPROVAL_NOTICE-446351.pdf (powys.gov.uk)

The relevant guidance[7] for assessing the impact of intensive farming activities on air quality advises ammonia "Process Contribution" (PC) (i.e., amount of ammonia that will be emitted from the development) should be determined and provided as a percentage of the identified sensitive sites ammonia Cle.

If it can be shown that:

- When PC plus the background levels of ammonia at all relevant sensitive sites does not exceed the Cle and;
- there are no other sources of ammonia to consider

then emissions can be considered insignificant, no detailed modelling is required, and the application can progress.

However, if:

- PC plus background levels of ammonia at a sensitive site exceeds the Cle or;
- there are other sources of ammonia to consider

then detailed modelling is required.

If detailed modelling shows that PC is below 1% of the relevant Cle, the application can proceed regardless of background level providing there are no other sources of ammonia to consider which would not be included in the background data.

The applicant has provided modelling which has calculated PC of ammonia at the relevant ecological receptors from the entire proposed facility should the variation be granted.

The modelling was undertaken using ADMS 5 using meteorological data (2017 to 2020 inclusive) interpolated from forecast fields of the Global Forecast System (GFS) Numerical Weather Prediction (NWP) system at the site location.

Modelled emissions from the 4 sheds have been based on the maximum emission concentration of 1 ppm from the scrubber model specified in the application (Inno+

[7] Natural Resources Wales / How to interpret the results from your screening or modelling exercise for Ammonia Emissions (GN 020)

Pollo-M 1-stage chemical air cleaner system). This performance is verified in the scrubbers DLG Test Report which was provided with the application. NRW agree with this approach in this instance.

The scrubbers provide the primary ventilation for the new sheds and each scrubber will be sized to remove a maximum 332,000 m^3 of air per hour (per shed). This is in alignment with NRW guidance[8], assuming birds will be grown to 2kg. When this capacity is exceeded, additional ventilation will be provided by summer cooling roof fans. These will only be used occasionally as a backup ventilation system and predicted emissions from these have been included within the applicant's modelling scenario.

For developments that propose the use of scrubbers, NRW guidance states a 5km screening distance should be used to identify sensitive sites upon which impact needs to be assessed when carrying out ammonia modelling[9] . The applicant has correctly identified 3 SSSI's within 5km (River Teme, Gwernaffel Dingle and Brampton Bryan Park SSSI) but has incorrectly used a 2km screening distance for ammonia sensitive ancient woodlands. However, our checks indicate that there are no further ammonia sensitive ancient woodlands within 5km that has not been identified in the assessment. NRW therefore accept the screening distances used in this instance. Note that the applicant has also assessed the impact on ancient woodland sites not classified as ammonia sensitive. This is not a requirement of the current guidance and hence the results for these sites will not be considered further.

The detailed modelling provided has calculated PC of ammonia at the sensitive sites identified and compared these against the relevant Cle. The applicant has not considered background levels of ammonia and this will be further discussed below (see modelling results). The assessment also considers Critical Load, however this is not a requirement of the current guidance and hence these results will not be considered further.

Modelling results

[8] Natural Resources Wales / Ammonia scrubber design and use
[9] Natural Resources Wales / Ammonia assessments: initial screening and evidence gathering (GN 020)

The detailed modelling results indicate that at all sensitive sites identified, the maximum PC is below 1% of the relevant Cle. The most impacted site was an ammonia sensitive ancient woodland where PC was predicted to be 0.62% of the relevant critical level (1.0 µg/m^3). NRW's Air Quality and Noise Team have completed check modelling and our results broadly agree with the applicant's.

As discussed, the applicant has not considered background levels of ammonia at the sensitive sites. However, this is considered acceptable in this instance as PC has been shown to be below 1% of the relevant Cle at all receptors and assessment of background levels would not alter the conclusions of the assessment.

Conclusions

The applicant has demonstrated that impacts on air quality in respect of ammonia can be screened out as insignificant. This is attributed to the use of scrubbers on all 4 poultry sheds. The permit will contain conditions and process monitoring requirements to ensure the facility is built and operated as applied for. We have also specified, as an improvement condition, the operator shall submit written confirmation and training documents to Natural Resources Wales to show that the necessary operating techniques are in place for the operation of the air scrubbing units and that all staff have received the necessary training.

10.2 Water

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent pollution of surface and ground water from the new buildings.

All contaminated water from the wash down of the new buildings and yard will be stored in underground dirty water tanks which will be built in line with recommendations set out in Sector Guidance Notes (SGN) EPR6.09 'How to comply with your environmental permit for intensive farming'[10]. When full, water from the tanks will be taken outside of the installation for spreading.

[10] how-to-comply-with-your-environmental-permit-additional-guidance-for-intensive-farming-saesneg-yn-unig.pdf (naturalresources.wales)

Clean uncontaminated water from the new building's roofs will be diverted via a guttering system to soakaway.

The applicant has confirmed that all manure will be exported from the site, with no storage or spreading of manure taking place within the installation boundary. The operator, as well as any third parties receiving the manure, will be required to comply with the controls set out in the Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 (CoAPR), which are designed to reduce water pollution from agricultural activities.

10.3 Odour

An odour risk assessment was provided as part of the application which concluded there was no increased risk of odour as a result of the variation. We agree with this conclusion as a result of the risk management measures proposed in the risk assessment and when also considering the proposal is to include scrubbers on all poultry sheds. Whilst the scrubbers will be in place to reduce ammonia emissions in the first instance, they will also act to control odour.

As there are sensitive receptors within 400 metres of the installation, the applicant has submitted a Odour Management Plan (OMP) for the installation as required by SGN EPR 6.09 'How to Comply with your Permit for Intensive Farming'.

The following further sources of odour have been identified by the applicant:

- the Broilers themselves
- Feed, including delivery and storage
- Problems with ventilation and heating systems
- Litter management
- Carcase disposal
- House clean out and washing operations
- Fugitive emissions (e.g., leaks on bins or fuel and chemical storage)

The OMP details various measures to minimise and mitigate odour issues including (but not limited to):

- Twice daily olfactory checks coinciding with stock inspections where any abnormalities are to be recorded and investigated.
- No on-site milling of feed and careful selection of feed (supplied from UKASTA accredited feed mill and reducing protein during the cycle)
- Feed delivery systems are sealed to minimise atmospheric dust and any spillage of feed around the bin is immediately swept up
- The ventilation and heating system is regularly adjusted to match the age and requirements of the flock.
- Carcasses to be placed into seal plastic bags and stored in sealed, shaded and vermin proof containers away from sensitive receptors.

We have compared the measures proposed to minimise odour at for the site to the Best Available Techniques (BAT) standards in SGN EPR 6.09 'How to Comply with your Environmental Permit for Intensive Farming' – Appendix 4 – 'Odour Management' and are satisfied that the techniques represent appropriate measures for the installation following this variation.

The OMP and the risk management methods outlined in the odour risk assessment will be incorporated into the operating techniques section of the permit.

Condition 3.3.1 in the permit requires odour from the activities to be below that which could cause pollution outside the site. We are satisfied that this will be sufficiently protective in conjunction with the measures described by the Applicant for minimising odour at the installation.

10.4 Noise

A noise risk assessment was provided as part of the application which concluded there was no increased risk of noise as a result of the variation. We agree with this conclusion as a result of the risk management measures outlined in the application.

As there are sensitive receptors within 400 metres of the installation, the applicant has submitted a Noise Management Plan (NMP) for the installation as required by SGN EPR 6.09 'How to Comply with your Permit for Intensive Farming'.

The following sources of noise have been identified by the Applicant:

- Ventilation fans
- Feed and fuel deliveries
- Feeding systems
- Alarms systems
- Bird catching
- Clean out operations
- Maintenance and repairs
- Standby generator testing

The NMP details various measures to minimise and mitigate noise issues including (but not limited to):

- Noise at the installation to be assessed twice a day
- Large capacity lorries to reduce number of deliveries required and lorries fitted with silencers
- Daily inspections of feed bins to prevent them running empty (and hence reduce noise when filled)
- Bird catching to be carried out by fully training catch team
- Maintenance and repairs to be carried out during working hours (07.00am – 23.00pm)

We have compared the measures proposed for the site to the BAT standards in SGN EPR 6.09 'How to Comply with your Environmental Permit for Intensive Farming' – Appendix 5 – 'Noise management at intensive livestock installations' and are satisfied that the techniques represent appropriate measures for the installation. The NMP will been incorporated into the operating techniques section of the permit.

The NMP and the risk management methods outlined in the noise risk assessment will be incorporated into the operating techniques section of the permit.

Condition 4.4.1 of the permit requires noise from the activities to be below that which could cause pollution outside the site. We are satisfied that this will be sufficiently

protective in conjunction with the measures described by the applicant for minimising noise at the installation.

We are satisfied that vibration is unlikely to be an issue at the installation. The nature of the intensive farming operation means that there are no significant sources of vibration on site. Therefore, vibration does not need to be included in the noise management plan.

10.5 Fugitive emissions

A risk assessment has been provided by the applicant which has identified a number of sources of potential fugitive emissions.

The applicant has confirmed that appropriate measures for preventing and minimising fugitive emissions are in place in accordance with the SGN EPR6.09 'How to comply with your environmental permit for intensive farming'. Examples of these measures include:

- Dust minimised by using suitable bedding materials and pelleted feed delivered in sealed systems
- Risk of pests managed by ensuring feed spillages are cleared up promptly and using a specialist contractor to control pests when needed
- The dirty water tanks will be built to specifications in in SGN EPR6.09 'How to comply with your environmental permit for intensive farming'.
- The fuel oil storage tanks for the generator and back up boiler are bunded. The bund meet the requirements of the Water Resources (Control of Pollution) (Silage, Slurry and Agricultural Fuel Oil) Regulations 2010 (SSAFO Regulations)

The Fugitive Risk Assessment which includes the proposed risk management measures will be incorporated into the Operating Techniques of the permit.

The applicant has also provided an Emergency Plan which details how risks of fugitive emissions will be managed during times of equipment failures, flood, spills etc. This will also be incorporated into the Operating Techniques of the permit.

We note that the applicant has not produced a specific dust or dust and bioaerosol management plan, despite the presence of receptors close to the installation. Based

on the application information discussed above, we are nevertheless satisfied that emissions will be adequately controlled in line with our guidance. Controls for dust and other specified operating techniques will also be effective in managing bioaerosol risk.

Permit condition 3.2.1 requires that emissions of substances not controlled by emission limits (i.e. fugitive emissions) shall not cause pollution. Condition 3.2.2 requires that a management plan shall be developed if pollution is subsequently identified.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise fugitive emissions and to prevent pollution from fugitive emissions.

10.6 Manure Management

Under the provisions of EPR, NRW does not have the legal vires / authority to impose conditions or regulate the storage, disposal and application of chicken manure to land through the EPR Permit unless these activities take place within the green installation boundary shown on the site plan in Schedule 7 of the permit. Also, the permit cannot create direct obligations on third parties regarding the management of manure produced by the regulated facility.

The Operator has confirmed that manure storage and spreading does not take place within the installation boundary, so is outside the regulatory scope of the Environmental Permitting (England and Wales) Regulations 2016 (as amended) and is not controlled by the EPR permit.

However, NRW will continue, in association with other authorities, to work with land owners and farmers to help ensure the nutrients in manures are applied following best practice. This includes the Code of Good Agricultural Practice, which applies to all farms in England and Wales and provides guidance on nutrient management (including land spreading of manure). Where it is clear this is not the case and results in pollution, we will take the appropriate action in accordance with our powers and duties.

Whilst a manure management plan is not required by the permit, we have set condition 2.3.3 which requires the operator to maintain and implement a system to record the quantities of solid manure or slurry exported from the installation. The record must include the date of export from the site, quantity exported and details of the receiving site. This condition will help us to establish if there is any relationship between manure export from a particular installation and reported pollution incidents. It will also assist us in verifying that the operator is meeting the requirements of the Waste Duty of Care.

11. Permit Conditions

11.1 Operating Techniques

We have reviewed the techniques used by the operator and compared these with the relevant guidance note: SGN EPR6.09 'How to comply with your environmental permit for intensive farming'. We consider them to represent appropriate techniques for the facility.

We have updated in Table S1.2 of the permit to include updated management plans and supporting documentation submitted with his application relating to the operation of the installation.

11.2 Monitoring

We have determined that the proposed certified scrubber will be capable of achieving the ammonia emission reduction specified in the application. In order to ensure the scrubbers continue to work effectively throughout operation of the installation, the permit will contain the following process monitoring requirements (in Table S3.5 Process limits and monitoring requirements):

- pH of Scrubber Liquor – 3.5 (Maximum)
- Conductivity of Scrubber Liquor - 200 µS/cm^3

No other monitoring requirements have been added or changed following this variation.

11.3 Reporting

Table S4.1 of the permit was updated to include the requirement for the operator to report on existing standard monitoring detailed in Table S3.1 in line with the standard requirements for intensive farming permits. The operator will also be required to report on the new process monitoring requirements discussed above on an annual basis following this variation.

No other reporting requirements have been changed following this variation.

ANNEX 1: Consultation Reponses

A) Advertising and Consultation on the Application

The Application has been advertised and consulted upon in accordance with Natural Resources Wales Public Participation Statement. The way in which this has been carried out along with the results of our consultation and how we have taken consultation responses into account in reaching our draft decision is summarised in this Annex. Copies of all consultation responses have been placed on Natural Resources Wales public register.

1) Consultation Responses from Statutory and Non-Statutory Bodies

Response Received from Public Health Wales	
Brief summary of issues raised:	**Summary of action taken / how this has been covered**
NRW should be satisfied the ammonia emission reduction is achievable as it is difficult to comment further based on the information provided in the application.	As discussed in section 4 of this document further information by way of Schedule 5 Notice was requested from the applicant regarding the anticipated ammonia emissions. See section 10.1 regarding our assessment of the detailed ammonia modelling submitted in response to the information request.
Comments regarding importance of odour controls	See section 10.3 regarding our assessment of the odour management plan.
Comments regarding manure spreading activities and important that the applicant ensures that any local watercourses are not adversely impacted due to any increased nutrient loading.	See section 10.2. The applicant has confirmed that manure will be exported from the installation. Therefore, this matter is outside of the scope of the application.
NRW should be satisfied with the control measures to mitigate fugitive emissions with specific mention of dust and bio-aerosols.	See section 10.5 regarding our assessment of fugitive emissions including dust and bio-aerosols.
NRW should ensure they are satisfied with storage of on-site liquids and control measures in place to avoid any emergency incidents, which could have off-site implications.	We have assessed the applicants proposed operating techniques in relation to storage of liquids and responses to emergency incidents and are satisfied the appropriate measures will be in place. See section 10.5.

Comments regarding the effectiveness of the noise management plan. Suggestion of a noise survey at the nearest residential receptor.	See section 10.4 regarding our assessment of the applicants noise risk assessment and management plan. We do not consider a noise survey is required in this instance.
Comments regarding the need for the Environmental Management System (EMS) needing to cover all operational controls and procedures for the increased number of broilers and for a timetable to be agreed for the operator to obtain external accreditation for their EMS e.g. ISO4001.	See section 6 regarding our assessment of the operators EMS. We do not require all operators' EMS to be accredited.
Comments regarding the operator needing o have sufficient mitigation in place should this be a flood risk area.	The site is not located within a flood risk area.

2) Consultation Responses from Members of the Public and Community Organisations

Response Received from Brecon and Radnor Campaign for the Protection of Rural Wales	
Brief summary of issues raised:	**Summary of action taken / how this has been covered**
Concerns regarding no ammonia assessment being submitted with the initial application.	As a result of the information received in this consultation response and further investigation by NRW, further information was requested from the applicant (including detailed ammonia modelling). See section 10.1 for more information.
Information regarding the planning permission for the 'existing' facility being subject conditions requiring the 2 'existing' sheds to have scrubber fitted, unlike the existing environmental permit. Concerns the initial risk assessment provided by the applicant, which is based on the existing sheds not having scrubbers installed is therefore incorrect.	
Recommendations that NRW should reconsider the applicant's argument that the variation will result in a betterment.	

ANNEX 2: Improvement Conditions

Table S1.3 Improvement programme requirements		
	Requirement	Date
1	The Operator shall submit written confirmation and training documents to Natural Resources Wales that the necessary operating techniques are in place for the operation of the air scrubbing units and that all staff have received the necessary training	A minimum of 10 days before the operation of the air scrubber on poultry building 1- 4